

67 Winthrop Road, Chester, CT 06412 Tel: 860-526-7801 Fax: 860-526-7802 ISO 9001:2008 registered purificationtech.com

January 4, 2013

Linda Brolin, Environmental Engineer U.S. Environmental Protection Agency 5 Post Office Square, Suite 1100 Mail Code: OES05-1 Boston, MA 02109

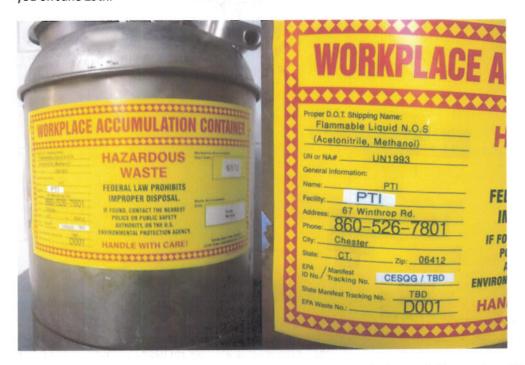
Dear Ms. Brolin:

RE: Response to NOV dated 12/14/12 regarding General Standards of Hazardous Waste

All violations noted in the NOV letter dated 12/14/12 were corrected within 24 hours of the inspection conducted by you on June 27, 2012. The specifics as to how each violation was corrected are explained below.

Failure to adequately label containers of hazardous waste with the words "Hazardous Waste" and a
description of the contents, such as the chemical name, as required by 40 CFR 262.32 and RCSA 22a449(c) – 102(a)

The 5-gallon container used for satellite accumulation outside of the main lab did contain a label with the words "Hazardous Waste, Flammable Liquid." The label was modified at the time of inspection (6/27/2012) to include a more detailed description of the waste. See pictures below, previously sent to you on June 29th.



All satellite accumulation containers in the facility are labeled with the words "Hazardous Waste" with a description of the contents, such as chemical name, in accordance with RCSA 22a - 449(c) - 102(a).



LIAKETU estand brod greenwij il LIAKETU estande il Tigo de li Liaketu LIAKETU estande il Tigo de li Liaketu

 $\eta = \frac{\eta_1}{\eta} = \frac{\eta_1}{\eta_2} = \frac{\eta_2}{\eta_2} = \frac{\eta_2}{\eta_2}$

Han advance t surprimental Espainer

The management Storection Agency

Front 2017's Square, Suite 1100

Wall tole GESOS-1

Storectic C109

world old revi

Perconnecto MCV dated 12/14/12 reparding General Standards of Hazardous Boote

24 - Julian Librario Timerio della State della Service della superiori di Indiana di Service di Service della Serv

Failure to adequately label containers of harmonic craste with the words " trazactions Weaver" (not as description of the opinions of the opinions, as the chemical name, as a equired by 40 CEP 103, 32 and 3050 225 and 3050 113, 4000 113

The sealor cores on user mean accumulation inside of themself is defined in the search of the core of the model of the search of the waste of the order of the waste of the order of the waste of the order of the or

All conglishes accommission and an included a labeled at the 1997 of the substitution of the 1997 of the congruence of the configuration of the configuratio

2. Failure to label or mark containers of universal waste batteries with any of the following phrases: "Universal Waste – Battery(ies)", "Waste Battery(ies)", or "Used Battery(ies), as required by 40 CFR 273.5 and RCSA 22a-449(c) 113.

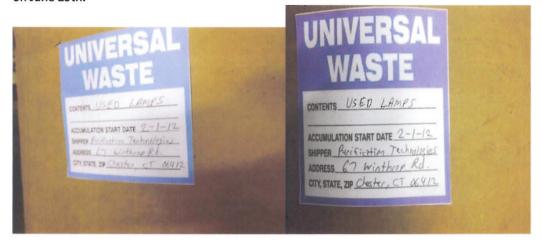
At the time of inspection the inspector noticed a 5-gallon container containing two nickel cadmium batteries, with no label and no date. On June 27th 2012 after the inspector left a new label with the accumulation start date was affixed to the container containing the words "Universal Waste" and "Used Batteries". See picture below which was previously sent to you on June 29th.



All Universal waste batteries in the facility are labeled with one of the following phrases: "Universal Waste – Battery(ies)", "Waste Battery(ies), "Used Battery(ies)", in accordance with RCSA 22a-449(c) – 113.

 Failure to date universal waste lamps or containers of universal waste lamps, as required by 40 CFR 273.5 and RCSA 22a-449(c) -113

One four-ft cardboard box labeled "used lamps" but with no date and one three-ft cardboard box, labeled "used lamps" but with no date was identified during the inspection. Both of these containers were relabeled with the proper accumulation start date after the inspectors left on June 27, 2012. See the pictures below of the two container's labels with accumulation dates, which were previously sent to you on June 29th.



All universal waste lamps or containers in the facility are dated with the date it becomes a waste or was received to demonstrate the length of time that the universal waste has been accumulated, in accordance with RCSA 22a-449(c)-113.

Failure to lain of mark containers of universal waste battgdes with any of the following phrajoss:
"Les versol Warge - Battany(batt, "Waste Batta rylles)", or "Used Battary(bat, assembled by 40 for 273 y and 80 must 22-349(c) 113.

If the time of inspection the inspect of repliced a 5-gallus-sustainer contaming two sickel cadmium satteries, with no label and so date. On lone 27th 2012 and inspector left, most local with the sum substitute fair date was affixed to the contamination the words," onwere a Moste" and containing the words," onwere a Moste" and containing the words, "see playing below which was proyonally sent up you go up a 20 p.



di universe volte datunco la rae traditi, are apietos witt one of teo following presse. Live trae trastitationale "Ratterylors", "Averte Batterylors", "Av

Failute cogațe universul maste (amas meantimere of mezernal waste lamps, at request by 40 TFE 22,5 Sapra RESA (15 angle), 3 EE

One four-fitterand we contained the Compact but were noticed and enough the exceptional design were used family by the inspection. But of the exceptional street with the property of an amulation start fate with the property of the accompact of the end of the which were a more with a compact of the end of th



As the transfer of the control of the facilities of the facilities of the control of the facilities of the facilities of the control of the facilities of th

 Failure to date universal waste batteries or containers of universal waste batteries, as required by 40 CFR 273.5 and RCSA 22a-449(c)-113.

As mentioned in violation #2, one 5-gallon container of used batteries was identified without a label and date at the time of the inspection. This container was labeled used batteries and was labeled with an accumulation start date after the inspectors left on June 27, 2012. See the picture identified with violation #2. All universal waste batteries or containers of universal waste batteries in the facility are dated with the date it becomes a waste or was received to demonstrate the length of time that the universal waste has been accumulated, in accordance with RCSA 22a-449(c)-113.

We have also reviewed our current waste management program with our environmental consultant, Aquair Environmental Consultants, LLC (AEC). Bill Williams, PE of AEC, inspected our facility on January 4, 2013 and indicated we were in compliance with the Hazardous Waste Regulations applicable to our CESQG status and Universal Waste management.

Please do not hesitate to contact me at 860-526-7801 if you have any questions or require any additional information.

Sincerely,

Alan Prince

Operations Manager

Fallurg to date universal waste batteries or containers of universal westerbatteries, we equired by 40 CF4 213.5 and RCSA 22a-440[c]-113

As montioned in violation #1, one signification to use distribution was domined without a label and date at the time of the majerior. This contains a was added used but eries and was londed with an account to no sunt also after the inspections for a long 27, 2012. See the picture bindle added with a violation of the contains and was the harrists of its facility and contains which has been a superior and of a superior with RESA TEACHIEF TO a contains the waste as been a superior in an organic with RESA TEACHIEF TO

We have according with a more and about management program solin our includements, our author, Aqualit Environmental Consultance 1994 Viol. Bill Williams, PE of A&s. Inspected on Techtry on Jamery 4, 2014 and increases a covered con of one-suith too Hazardous Wastle-Regul Woos contrable to our CES 30 status and specimen seque management.

Prease do not besitate to contact me at 860-525. ZBOLIf you have any questions or require any additional other

Are only

Sommit health

manufacture of the soft